

### **REMARKS**

Reconsideration of the present application is respectfully requested. Independent claims 1, 9, 13, 18 and 25 have been amended. Claims 1 - 28 are currently pending.

#### **Rejections based on 35 U.S.C. § 103**

Claims 1 – 28 stand rejected under 35 U.S.C. §103(a) as being anticipated by Sullivan, U.S. Patent No. 5,737,557 (“Sullivan”), in view of Cosic, U.S. Patent No. 7,117,225 (“Cosic”). Applicants have amended the independent claims in response to this rejection. Specifically, claim 1 now recites “a reference-counting mechanism configured to count the number of relationships between an item and other of said plurality of items in the universal data storage device and being further configured to delete said item from the universal data storage device when all relationships to said item are removed.” Applicants respectfully submit that neither Sullivan nor Cosic, either alone or in combination, teaches or suggests the claimed “reference-counting mechanism.” Independent claims 9, 13, 18 and 25 include similar claim language and are likewise patentable over Sullivan and Cosic.

The Office Action relies on Cosic to teach a universal data storage device and relies on Sullivan to teach the deleting of items from a data store based on changes to a relationship. Office Action, pp. 5-6. Sullivan provides a system that “facilitates the deinstallation of files represented by a particular suite window or icon.” Sullivan, col. 3, lines 53-55. Specifically, Sullivan discloses a method to delete all files associated with an application once a user chooses to uninstall that application. Sullivan, col. 11, lines 3-33. As explained by the Office Action, Sullivan teaches that:

The user could similarly choose to deinstall the application and remove the icon from the display. In this instance all files recorded

in the storage element that are associated with the icon would be deleted and the icon itself would be deleted.

Office Action at p. 6 (citing Sullivan, col. 11, lines 3-33). As illustrated by this citation, Sullivan maintains a list of related files and treats these files as a group. Confirming this fact, Sullivan states that its “system facilitates the execution of a variety of operations that apply to the collective properties of the *set of items* as a whole, *rather than to each of the items individually.*” Sullivan, col. 3, lines 42- 44.

While Sullivan discloses applying an operation to a set of related items, Sullivan is silent as to deleting files based any relationship counting. Indeed, the deletion of files in Sullivan is triggered by a user input ordering a group of items (e.g. a “suite”) to be uninstalled. Sullivan, however, does not teach any mechanism that counts the relationships associated with an item and that then deletes that item based on the results of the relationship counting, e.g., “when all relationships to said item are removed.”

In contrast to Sullivan’s deleting of all files associated with an application, independent claim 1 requires “a reference-counting mechanism configured to count the number of relationships between an item and other of said plurality of items in the universal data storage device and being further configured to delete said item from the universal data storage device when all relationships to said item are removed.” Independent claims 9, 13, 18, and 25 contain similar language. As such, neither Sullivan nor Cosic, either alone or in combination teaches or suggests each and every element of the present independent claims. Accordingly, Applicants respectfully submit that amended independent claims 1, 9, 13, 18, and 25 are in condition for allowance.

Applicants also submit that dependent claims 2 - 8, which depend from claim 1, are in condition for allowance for at least the same reasons discussed above with respect to claim

1. Furthermore, Applicants submit that dependent claims 10 - 12, which depend from claim 9, are in condition for allowance for at least the same reasons discussed above with respect to claim 9. Applicants submit that dependent claims 14- 17, which depend from claim 13, are in condition for allowance for at least the same reasons discussed above with respect to claim 13. Applicants also submit that dependent claims 19 - 24, which depend from claim 18, are in condition for allowance for at least the same reasons discussed above with respect to claim 18. Applicants submit that dependent claims 26 - 28, which depend from claim 25, are in condition for allowance for at least the same reasons discussed above with respect to claim 25.

### **Conclusion**

For the reasons stated above, claims 1 – 28 are in condition for allowance. If any issues remain which would prevent issuance of this application, the Examiner is urged to contact the undersigned prior to issuing a subsequent action. The Commissioner is hereby authorized to charge any additional amount required, or credit any overpayment, to Deposit Account No. 19-2112.

Respectfully submitted,

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